

Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382

AIR QUALITY PERMIT

Permittee Name: Publishers Printing Company
Mailing Address: 100 Frank E. Simon Avenue, Shepherdsville, Kentucky
40165

Source Name: Publishers Printing Company
Mailing Address: 100 Frank E. Simon Avenue, Shepherdsville, Kentucky
40165

Source Location: 100 Frank E. Simon Avenue, Shepherdsville, Kentucky

Permit Type: Federally-Enforceable
Review Type: Title V/Synthetic Minor/Non-CTG RACT

Permit Number: V-99-063
Log Number: 50243(F439)
Application
Complete Date: June 29, 1998

KYEIS ID #: 104-0440-0019
AFS Plant ID #: 21-029-00019
SIC Code: 2721

Region: North Central
County: Bullitt

Issuance Date: June 26, 2001
Expiration Date: June 26, 2006

John E. Hornback, Director
Division for Air Quality

TABLE OF CONTENTS

<u>SECTION</u>		<u>DATE OF ISSUANCE</u>	<u>PAGE</u>
SECTION A	PERMIT AUTHORIZATION	June 26, 2001	1
SECTION B	EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS	June 26, 2001	2
SECTION C	INSIGNIFICANT ACTIVITIES	June 26, 2001	7
SECTION D	SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS	June 26, 2001	8
SECTION E	SOURCE CONTROL EQUIPMENT OPERATING REQUIREMENTS	June 26, 2001	9
SECTION F	MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS	June 26, 2001	10
SECTION G	GENERAL CONDITIONS	June 26, 2001	13
SECTION H	ALTERNATE OPERATING SCENARIOS	June 26, 2001	18
SECTION I	COMPLIANCE SCHEDULE	June 26, 2001	23

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application which was determined to be complete on June 29, 1998, the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in the Regulation 401 KAR 50:035, Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

- 01 (437)** Hantscho Mark VI 6 Unit Web Offset Heatset Lithographic Printing Press 437 with a 2.56 MMBTU/hr natural gas fired dryer
Maximum continuous rating: Ink - 30 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.34 gal/hr
Construction commenced: December, 1983
- 02 (441)** HantschoMark II 2 Unit Web Offset Heatset Lithographic Printing Press 441 with a 1.8 MMBTU/hr natural gas fired dryer
Maximum continuous rating: Ink - 20 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.11 gal/hr
Construction commenced: January, 1978
- 03 (442)** Hantscho Mark IV 4 Unit Web Offset Heatset Lithographic Printing Press 442 with a 5.50 MMBTU/hr natural gas fired dryer
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 1.1 lbs/hr
Manual Blanket wash - 0.23 gal/hr
Construction commenced: May, 1995
- 04 (444)** Harris M-80 5 Unit Web Offset Heatset Lithographic Printing Press 444 with a 0.96 MMBTU/hr natural gas fired dryer
Maximum continuous rating: Ink - 30 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.14 gal/hr
Construction commenced: April, 1979
- 05 (446)** Hantscho Mark VI 8 Unit Web Offset Heatset Lithographic Printing Press 446 with a 2.2 MMBTU/hr natural gas fired dryer
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.46 gal/hr
Construction commenced: February, 1978
- 06 (448)** Hantscho Mark VI 8 Unit Web Offset Heatset Lithographic Printing Press 448 with a 2.2 MMBTU/hr natural gas fired dryer
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.46 gal/hr
Construction commenced: May, 1981

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- 07 (449)** Hantscho Mark VI 5 Unit Web Offset Heatset Lithographic Printing Press 449 with a 2.2 MMBTU/hr natural gas fired dryer
Maximum continuous rating: Ink - 30 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.29 gal/hr
Construction commenced: June, 1982
- 08 (450)** Harris M-80 5 Unit Web Offset Heatset Lithographic Printing Press 450 with a 1.925 MMBTU/hr natural gas fired dryer
Maximum continuous rating: Ink - 30 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.14 gal/hr
Construction commenced: January, 1990
- 09 (470)** Hantscho Mark Via 9 Unit Web Offset Heatset Lithographic Printing Press 470 with a 3.3 MMBTU/hr natural gas fired dryer
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 2.9 lbs/hr
Automatic Blanket wash - 0.52 gal/hr
Construction commenced: May, 1987
- 10 (484)** Harris M-80 5 Unit Web Offset Heatset Lithographic Printing Press 484 with a 0.96 MMBTU/hr natural gas fired dryer
Maximum continuous rating: Ink - 30 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.14 gal/hr
Construction commenced: March, 1985

Control Equipment:

One Meg Tec Systems Cleanswitch CS-250-95S regenerative thermal oxidizer controlling 10 presses to be installed as stated in Section I, Compliance Schedule
Claimed VOC (volatile organic compounds) destruction efficiency: 90%

APPLICABLE REGULATIONS:

401 KAR 50:012, General application effective June 24, 1992, requiring implementation of standards for national primary and secondary ambient air quality, specifies that control procedures that are reasonable, available, and practical be used.

1. Operating Limitations:

1. Usage rates and VOC contents of all VOC containing materials shall be restricted so as to meet the limitations in Section B.2.
2. Each press and the control device shall be interlocked at all times during press operation.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. The following are the RACT (Reasonable Available Control Technology) requirements determined under 401 KAR 50:012:
 - 1) a 90% VOC destruction efficiency by the regenerative thermal oxidizer controlling each press' dryer exhaust;
 - 2) fountain solution as applied containing less than 3% by weight alcohol substitutes and containing no alcohol and no other VOC's;
 - 3) blanket wash with a vapor pressure of less than 10 mmHg at 20 degrees C.
4. The following are the procedures for handling the used rags that have been used to wash the blankets on the presses:
 - 1) The used rags are collected in a closed metal container that contains a fake bottom that allows all fluid to drain from the rags in a waiting period of 3 to 4 days.
 - 2) A plug in the bottom of the container is opened to allow drainage and collection of the drained fluid which is picked up and disposed of off site by a waste disposal facility. The used rags are collected, laundered off site by a rag laundering facility, and returned to the company for reuse.
5. Negative pressure shall be maintained at each dryer's exhaust inlet when the corresponding press is in operation.

Compliance Demonstration Method:

1. The 90% VOC destruction efficiency by the regenerative thermal oxidizer will be demonstrated by testing, No. 3 of this section.
2. The fountain solution requirement will be demonstrated through recordkeeping, No.5 of this section.
3. The blanket wash requirement will be demonstrated through recordkeeping, No. 5 of this section.

2. Emission Limitations:

VOC emissions from Press 442 shall not equal or exceed 40 tons/yr based on a 12 month rolling total to preclude applicability of 401 KAR 51:052, Review of new sources in or impacting upon nonattainment areas.

Compliance Demonstration Method:

The following formulas may be used in calculating emissions of VOC's from Press 442:

1. $\text{VOC emitted from ink (tons/month)} = \text{tons of ink used per month} \times 80\% \text{ ink not retained in paper} \times \% \text{ VOC content of ink} \times 100\% \text{ VOC capture efficiency} \times (1 - \text{VOC destruction efficiency of the thermal oxidizer})$
2. $\text{VOC emitted from fountain solution(tons/month)} = [\text{tons of fountain solution used per month} \times \% \text{ VOC content of fountain solution} \times 70\% \text{ VOC capture efficiency} \times (1 - \text{VOC destruction efficiency of the thermal oxidizer})] + [\text{tons of fountain solution used per month} \times \% \text{ VOC content of fountain solution} \times 30\% \text{ VOC not captured}]$
3. $\text{VOC emitted from manual blanket wash cleanup(tons/month)} = \text{gallons of blanket wash used per month} \times 50\% \text{ blanket wash not retained in rags} \times \text{VOC content of blanket wash(lbs/gal)} \times (1\text{ton}/2000\text{lbs})$

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. Total VOC's emitted = VOC's emitted from ink + VOC's emitted from fountain solution + VOC's emitted from blanket wash cleanup

3. Testing Requirements:

The permittee shall conduct required performance tests on the regenerative thermal oxidizer to determine the destruction efficiency of volatile organic compounds using a method specified in Regulation 401 KAR 50:015, Documents incorporated by reference, approved in the Compliance Test Protocol. A continuous measure of the combustion chamber temperature of the regenerative thermal oxidizer shall be made during the test. See No. 4.1 of this section. Testing shall take place according to Section I, Compliance Schedule and if required by the division, six months before the expiration date of this permit.

4. Specific Monitoring Requirements:

A monitoring device for the continuous measurement of the combustion chamber temperature of the regenerative thermal oxidizer shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The monitoring device shall be certified by the manufacturer to be accurate to +/- 1 percent of the temperature being monitored. The monitoring device shall be connected to a device(s) that records the temperature via a strip chart, electronic media, or other means.

5. Specific Recordkeeping Requirements:

1. For Press 442, the permittee shall keep monthly records of the usage rates of all materials used at the press along with a calculation of total emissions of VOC for the current month and per 12 months. The emissions per 12 month totals shall be based on a 12 month rolling total. These records, as well as purchase orders and invoices for all VOC containing materials shall be made available for inspection upon request by any duly authorized representatives of the Division for Air Quality.
2. The permittee shall maintain records of the following information for the regenerative thermal oxidizer:
 - a. The design and/or manufacturer's specifications.
 - b. The operational procedures and preventative maintenance records.
 - c. The combustion chamber temperature shall be recorded once per hour.
 - d. During all periods of startup, shutdown, or malfunction of the regenerative thermal oxidizer, a daily log of the following shall be kept:
 1. Whether any air emissions were visible from the facilities associated with the regenerative thermal oxidizer.
 2. Whether visible emissions were normal for the process.
 3. The cause of the visible emissions.
 4. Any corrective action taken.
3. The permittee shall maintain records of the following information for the fountain solution being used:
 - a. the material safety data sheet of the fountain solution.
 - b. the as applied weight percentage of alcohol substitutes, alcohol, and total VOC's.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. The permittee shall maintain records of the following information for the blanket wash being used:
 - a. the material safety data sheet of the blanket wash showing vapor pressure.
6. **Specific Reporting Requirements:**
The permittee shall submit a semi-annual report to the Division's Frankfort Field Office which contains a summary report of all recordkeeping required in No. 5.1 of this section.
7. **Specific Control Equipment Operating Conditions:**
 1. The regenerative thermal oxidizer control equipment shall be maintained and operated to ensure compliance with all requirements for each press.
 2. The minimum operating temperature of the regenerative thermal oxidizer control equipment shall be 1600 degrees F or the temperature established during the most recent performance test to maintain a minimum VOC destruction efficiency of 90%.
8. **Alternate Operating Scenarios:**
See Section H.
9. **Compliance Schedule:**
See Section I.
10. **Compliance Certification Requirements:**
See Section F(7).

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to Regulation 401 KAR 50:035, Section 5(4). While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. Waste paper cyclone	401 KAR 59:010
2. Small hot melt gluers	None
3. Ink jet printing and head cleaning	None
4. Two magazine glueing machines	None
5. Cooling tower	401 KAR 63:010
6. Non process space and water heaters	None
7. Bindery parts cleaner	None
8. Chillers	None
9. Bucket cleaner	None
10. Cold solvent cleaner	401 KAR 59:185

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. VOC emissions, as measured by methods referenced in 401 KAR 50:015, Section 1, shall not exceed the respective limitations specified herein.
2. Compliance with annual emissions and processing limitations imposed pursuant to 401 KAR 50:035, Section 7(1)(a), and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

1. When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
 - a. Date, place as defined in this permit, and time of sampling or measurements.
 - b. Analyses performance dates;
 - c. Company or entity that performed analyses;
 - d. Analytical techniques or methods used;
 - e. Analyses results; and
 - f. Operating conditions during time of sampling or measurement;
2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [401 KAR 50:035, Permits, Section 7(1)(d)2 and 401 KAR 50:035, Permits, Section 7(2)(c)]
3. In accordance with the requirements of Regulation 401 KAR 50:035, Permits, Section 7(2)(c) the permittee shall allow the Cabinet or authorized representatives to perform the following:
 - a. Enter upon the premises where a source is located or emissions-related activity is conducted, or where records are kept;
 - b. Have access to and copy, at reasonable times, any records required by the permit:
 - i. During normal office hours, and
 - ii. During periods of emergency when prompt access to records is essential to proper assessment by the Cabinet;
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency; and
 - d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
5. Summary reports of any monitoring required by this permit shall be submitted to the division's Frankfort Regional Office at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation.

The reports are due within 30 days after the end of each six-month reporting period that commences on the initial issuance date of this permit. The permittee may shift to semi-annual reporting on a calendar year basis upon approval of the regional office. If calendar year reporting is approved, the semi-annual reports are due January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to Section 6(1) of 401 KAR 50:035, Permits. All deviations from permit requirements shall be clearly identified in the reports.

6. a. In accordance with the provisions of Regulation 401 KAR 50:055, Section 1 the owner or operator shall notify the Division for Air Quality's Frankfort Regional Office concerning startups, shutdowns, or malfunctions as follows:
 1. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 2. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.
- b. In accordance with the provisions of Regulation 401 KAR 50:035, Section 7(1)(e)2, the owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by general condition 6 a. above) to the Division for Air Quality's Frankfort Regional Office within 30 days. Other deviations from permit requirements shall be included in the semiannual report required by general condition F.5.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

7. Pursuant to Regulation 401 KAR 50:035, Permits, Section 7(2)(b), the permittee shall certify compliance with the terms and conditions contained in this permit, annually on the permit issuance anniversary date or by January 30th of each year if calendar year reporting is approved by the regional office, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Division for Air Quality's Frankfort Regional Office and the U.S. EPA in accordance with the following requirements:
- Identification of each term or condition of the permit that is the basis of the certification;
 - The compliance status regarding each term or condition of the permit;
 - Whether compliance was continuous or intermittent; and
 - The method used for determining the compliance status for the source, currently and over the reporting period, pursuant to 401 KAR 50:035, Section 7(1)(c),(d), and (e).
 - For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
 - The certification shall be postmarked by the thirtieth (30) day following the applicable permit issuance anniversary date, or by January 30th of each year if calendar year reporting is approved by the regional office. **Annual compliance certifications should be mailed to the following addresses:**

**Division for Air Quality
Frankfort Regional Office
643 Teton Trail, Suite B
Frankfort, KY 40601**

**U.S. EPA Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960**

**Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601**

8. In accordance with Regulation 401 KAR 50:035, Section 23, the permittee shall provide the division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission report is mailed to the permittee.
9. Pursuant to Section VII.3 of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the division by the source or its representative within forty-five days after the completion of the fieldwork.

SECTION G - GENERAL CONDITIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. A noncompliance shall be (a) violation(s) of state regulation 401 KAR 50:035, Permits, Section 7(3)(d) [and for federally enforceable permits is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act)] and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition.
3. This permit may be revised, revoked, reopened and reissued, or terminated for cause. The permit will be reopened for cause and revised accordingly under the following circumstances:
 - a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to Regulation 401 KAR 50:035, Section 12(2)(c);
 - b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
 - c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish to the division, in writing, information that the division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. [401 KAR 50:035, Permits, Section 7(2)(b)3e and 401 KAR 50:035, Permits, Section 7(3)(j)]
5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority.

SECTION G - GENERAL CONDITIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [401 KAR 50:035, Permits, Section 7(3)(k)]
7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance. [401 KAR 50:035, Permits, Section 7(3)(e)]
8. Except as identified as state-origin requirements in this permit, all terms and conditions contained herein shall be enforceable by the United States Environmental Protection Agency and citizens of the United States.
9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6). [401 KAR 50:035, Permits, Section 7(3)(h)]
10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 50:035, Permits, Section 8(3)(b)]
11. This permit shall not convey property rights or exclusive privileges. [401 KAR 50:035, Permits, Section 7 (3)(g)]
12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.
13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry. [401 KAR 50:035, Permits, Section 7(2)(b)5]
14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders. [401 KAR 50:035, Permits, Section 8(3)(a)]
15. Permit Shield: Except as provided in State Regulation 401 KAR 50:035, Permits, compliance by the affected facilities listed herein with the conditions of this permit shall be deemed to be compliance with all applicable requirements identified in this permit as of the date of issuance of this permit.
16. All previously issued construction and operating permits are hereby subsumed into this permit.

SECTION G - GENERAL CONDITIONS (CONTINUED)**(b) Permit Expiration and Reapplication Requirements**

This permit shall remain in effect for a fixed term of five (5) years following the original date of issue.

Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the division. [401 KAR 50:035, Permits, Section 12]

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of Regulation 401 KAR 50:035, Section 15.
2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority thirty (30) days in advance of the transfer.

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements

None

(e) Acid Rain Program Requirements

1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

(f) Emergency Provisions

1. An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and the permittee can identify the cause of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit;

SECTION G - GENERAL CONDITIONS (CONTINUED)

and,

- d. The permittee notified the division as promptly as possible and submitted written notice of the emergency to the division within two working days after the time when emission limitations were exceeded due to the emergency. The notice shall meet the requirements of 401 KAR 50:035, Permits, Section 7(1)(e)2, and include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken. This requirement does not relieve the source of any other local, state or federal notification requirements.
2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement.
3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 50:035, Permits, Section 9(3)]

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:
RMP Reporting Center
P.O. Box 3346
Merrifield, VA, 22116-3346
2. If requested, submit additional relevant information by the division or the U.S. EPA.

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.
 - e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

SECTION G - GENERAL CONDITIONS (CONTINUED)

2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

SECTION H - ALTERNATE OPERATING SCENARIOS

The alternate operating scenarios set forth below have been approved by the division based on information supplied with the application and during the application review process. The terms and conditions of each alternate operating scenario have been developed to ensure compliance with the applicable regulations. The permittee, when making a change from one operating scenario to another, shall record contemporaneously in a log at the permitted facility a record of the scenario under which the facility is operating. The permit shield, as provided in Section G, Condition (a)15, shall extend to each alternate operating scenario set forth in this Section. All conditions not specified under an alternate operating scenario shall remain unchanged from their permit values or requirements.

This alternate operating scenario using the existing condenser/filter control devices will be in operation until the installation and start-up of the new regenerative thermal oxidizer control device – See Section I, Compliance Schedule.

- EC1 (441)** HantschoMark II 2 Unit Web Offset Heatset Lithographic Printing Press 441 with a 1.8 MMBTU/hr natural gas fired dryer controlled by Publishers Printing Company APC#3 condenser/filter system - destruction efficiency – 62.6%
Maximum continuous rating: Ink - 20 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.11 gal/hr
Construction commenced: January, 1978
- (442)** Hantscho Mark IV 4 Unit Web Offset Heatset Lithographic Printing Press 442 with a 5.50 MMBTU/hr natural gas fired dryer controlled by Publishers Printing Company APC#3 condenser/filter system – destruction efficiency – 62.6%
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 1.1 lbs/hr
Manual Blanket wash - 0.23 gal/hr
Construction commenced: May, 1995
- (444)** Harris M-80 5 Unit Web Offset Heatset Lithographic Printing Press 444 with a 0.96 MMBTU/hr natural gas fired dryer controlled by Publishers Printing Company APC#3 condenser/filter system - destruction efficiency – 62.6%
Maximum continuous rating: Ink - 30 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.14 gal/hr
Construction commenced: April, 1979
- (449)** Hantscho Mark VI 5 Unit Web Offset Heatset Lithographic Printing Press 449 with a 2.2 MMBTU/hr natural gas fired dryer controlled by Publishers Printing Company APC#3 condenser/filter system - destruction efficiency – 62.6%
Maximum continuous rating: Ink - 30 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.29 gal/hr
Construction commenced: June, 1982

SECTION H - ALTERNATE OPERATING SCENARIOS (CONTINUED)

- EC2 (437)** Hantscho Mark VI 6 Unit Web Offset Heatset Lithographic Printing Press 437 with a 2.56 MMBTU/hr natural gas fired dryer controlled by Publishers Printing Company APC#2 condenser/filter system - destruction efficiency – 62.6%
Maximum continuous rating: Ink - 30 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.34 gal/hr
Construction commenced: December, 1983
- (446)** Hantscho Mark VI 8 Unit Web Offset Heatset Lithographic Printing Press 446 with a 2.2 MMBTU/hr natural gas fired dryer controlled by Publishers Printing Company APC#2 condenser/filter system - destruction efficiency – 62.6%
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.46 gal/hr
Construction commenced: February, 1978
- (448)** Hantscho Mark VI 8 Unit Web Offset Heatset Lithographic Printing Press 448 with a 2.2 MMBTU/hr natural gas fired dryer controlled by Publishers Printing Company APC#2 condenser/filter system - destruction efficiency – 62.6%
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.46 gal/hr
Construction commenced: May, 1981
- (484)** Harris M-80 5 Unit Web Offset Heatset Lithographic Printing Press 484 with a 0.96 MMBTU/hr natural gas fired dryer controlled by Publishers Printing Company APC#2 condenser/filter system - destruction efficiency – 62.6%
Maximum continuous rating: Ink - 30 lbs/hr
Fountain solution - 2.9 lbs/hr
Manual Blanket wash - 0.14 gal/hr
Construction commenced: March, 1985
- EC3 (470)** Hantscho Mark Via 9 Unit Web Offset Heatset Lithographic Printing Press 470 with a 3.3 MMBTU/hr natural gas fired dryer controlled by Publishers Printing Company APC#1 condenser/filter system - destruction efficiency – 62.6%
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 2.9 lbs/hr
Automatic Blanket wash - 0.52 gal/hr
Construction commenced: May, 1987
- EC4 (450)** Harris M-80 5 Unit Web Offset Heatset Lithographic Printing Press 450 with a 1.925 MMBTU/hr natural gas fired dryer controlled by MMT Environmental - PPFS - 5000M condenser/filter system - destruction efficiency – 62.6%
Maximum continuous rating: Ink - 30 lbs/hr
Fountain solution - 2.9 lbs/hr

SECTION H - ALTERNATE OPERATING SCENARIOS (CONTINUED)

Manual Blanket wash - 0.14 gal/hr

Construction commenced: January, 1990

APPLICABLE REGULATIONS:

None

1. Operating Limitations:

The following are the procedures for handling the used rags that have been used to wash the blankets on the presses:

- 1) The used rags are collected in a closed metal container that contains a fake bottom that allows all fluid to drain from the rags in a waiting period of 3 to 4 days.
- 2) A plug in the bottom of the container is opened to allow drainage and collection of the drained fluid which is picked up and disposed of off site by a waste disposal facility. The used rags are collected, laundered off site by a rag laundering facility, and returned to the company for reuse.

2. Emission Limitations:

VOC emissions from Press 442 shall not equal or exceed 40 tons/yr based on a 12 month rolling total to preclude applicability of 401 KAR 51:052, Review of new sources in or impacting upon nonattainment areas.

Compliance Demonstration Method:

The following formulas may be used in calculating emissions of VOC's from Press 442:

1. $\text{VOC emitted from ink (tons/month)} = \text{tons of ink used per month} \times 80\% \text{ ink not retained in paper} \times \% \text{ VOC content of ink} \times 100\% \text{ VOC capture efficiency} \times (1 - \text{VOC destruction efficiency of the condenser/filter control system})$
2. $\text{VOC emitted from fountain solution (tons/month)} = [\text{tons of fountain solution used per month} \times \% \text{ VOC content of fountain solution} \times 70\% \text{ VOC capture efficiency} \times (1 - \text{VOC destruction efficiency of the condenser/filter control system})] + [\text{tons of fountain solution used per month} \times \% \text{ VOC content of fountain solution} \times 30\% \text{ VOC not captured}]$
3. $\text{VOC emitted from manual blanket wash cleanup (tons/month)} = \text{gallons of blanket wash used per month} \times 50\% \text{ blanket wash not retained in rags} \times \text{VOC content of blanket wash (lbs/gal)} \times (1 \text{ ton} / 2000 \text{ lbs})$
4. $\text{Total VOC's emitted} = \text{VOC's emitted from ink} + \text{VOC's emitted from fountain solution} + \text{VOC's emitted from blanket wash cleanup}$

3. Testing Requirements:

None

4. Specific Monitoring Requirements:

1. A monitoring device for the continuous measurement of the inlet and outlet temperature of each condenser/filter control system shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The monitoring device shall be certified by the manufacturer to be accurate to +/- 1 percent of the temperature being monitored. The monitoring device shall be

SECTION H - ALTERNATE OPERATING SCENARIOS (CONTINUED)

connected to a device(s) that records the temperature via a strip chart, electronic media, or other means.

2. Monitoring devices for the continuous measurement of pressure drops across each condenser/filter control system shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The monitoring devices shall be certified by the manufacturer to be accurate to +/- 1 percent of the pressure drop being monitored.

5. Specific Recordkeeping Requirements:

1. For Press 442, the permittee shall keep monthly records of the usage rates of all materials used at the press along with a calculation of total emissions of VOC for the current month and per 12 months. The emissions per 12 month totals shall be based on a 12 month rolling total. These records, as well as purchase orders and invoices for all VOC containing materials shall be made available for inspection upon request by any duly authorized representatives of the Division for Air Quality.
2. The permittee shall maintain records of the following information for each condenser/filter control system:
 - a. The design and/or manufacturer's specifications.
 - b. The operational procedures and preventative maintenance records.
 - c. The temperature monitoring devices shall be recorded once per hour.
 - d. The pressure drop monitoring devices shall be recorded once per shift.
 - e. The permittee shall record all periods (during actual operation) during which the temperature difference across the condenser/filter control system (outlet temperature - inlet temperature) is zero or positive and corrective actions taken.
 - f. The permittee shall record all periods (during actual operation) during which the pressure drops across the condenser/filter control system are zero or positive and corrective actions taken.
 - g. During all periods of startup, shutdown, or malfunction of each condenser/filter control system, a daily log of the following shall be kept:
 1. Whether any air emissions were visible from the facilities associated with the condenser/filter control system.
 2. Whether visible emissions were normal for the process.
 3. The cause of the visible emissions.
 4. Any corrective action taken.

6. Specific Reporting Requirements:

The permittee shall submit a semi-annual report to the Division's Frankfort Field Office which contains a summary report of all recordkeeping required in Sections 5.1, 5.2e., and 5.2f., of this section.

7. Specific Control Equipment Operating Conditions:

The condenser/filter control systems shall be maintained and operated to ensure compliance with all requirements for each press.

SECTION H - ALTERNATE OPERATING SCENARIOS (CONTINUED)

- 8. Alternate Operating Scenarios:**
See Section B.
- 9. Compliance Schedule:**
See Section I.
- 10. Compliance Certification Requirements:**
See Section F(7).

SECTION I - COMPLIANCE SCHEDULE

This section contains compliance schedule requirements as required by 401 KAR 50:035, Permits, Section 7(2)(a). Progress reports on this schedule must be submitted at least semiannually, or at more frequent intervals if required in the specific conditions outlined below. Reports shall include the following items: (a) Dates scheduled for achieving each milestone, and the actual date that compliance is achieved; and (b) An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted to ensure that compliance with future items will be brought back on schedule.

A.401 KAR 50:012, General application, required RACT (reasonable available control technology)VOC controls. During the Title V review it was determined that the existing condenser/filter control systems in place on the existing offset heatset lithographic printing presses were not sufficient to meet these requirements. Therefore the source will replace the existing condenser/filter control systems with one Meg Tec Systems Cleanswitch CS-250-955 regenerative thermal oxidizer to control all 10 presses. Following is the compliance schedule:

1. Installation of the new control equipment will begin by December 1, 2001.
2. Operation will begin and compliance will be demonstrated on the new control equipment by June 1, 2002.

B.Compliance with the terms and conditions of this Section shall be certified annually on the permit anniversary date, to the Division for Air Quality and to the U. S. EPA when compliance has been achieved.

The compliance certification shall include the following:

1. The identification of the permit term or condition in this Section that is the basis of the certification;
2. The compliance status;
3. Whether compliance is continuous or intermittent; and,
4. The method used for determining the compliance status, currently and over the the reporting period pursuant to 401 KAR 50:035, Section 7(1)(c),(d), and (e).